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January 26, 2017

BY ECF

Honorable Cheryl L. Pollak
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Nchewi Akpoke v. City of New York, et al.
15-CV-6960 (ILG)(CLP)

Your Honor:

I am a Senior Counsel in the Special Federal Litigation Division of the New York City Law Department handling the defense of the above-referenced matter on behalf of defendants City of New York, Officer Hesterhagen, Officer Golat, and Sergeant Dicecco. In that capacity, I write with the consent of plaintiff's counsel, Ryan Lozar, Esq., to respectfully request that the time within which to complete depositions be extended from February 1, 2017 up to and including March 10, 2017, and that the Status Conference currently scheduled for February 9, 2017 at 10:30 A.M. be adjourned to a date and time convenient for the Court after March 10, 2017.

By way of background, the parties have conducted paper discovery and plaintiff has been deposed. Plaintiff still needs to depose the three named defendants. I am currently scheduled to commence a trial before the Honorable Paul G. Gardephe in the Southern District on New York on February 6, 2017 on the case of Robert Milton v. Phillip Johnson, 13-CV-8046 (PGG). The trial is expected to last approximately four to five days. In light of this, and due to the time spent prepping for trial, it is respectfully requested that the Court extend the time within which to complete depositions and to adjourn the February 10, 2017 Status Conference until a date and time convenient to the Court, after the proposed March 10, 2017 extension of deposition discovery.

Thank you for your consideration.

Respectfully submitted,

/s/

Evan Brustein
Senior Counsel
Special Federal Litigation Division

So Ordered
Cheryl Pollak
1/26/17

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